

Doc. No.: INCITS B10/02 N2042

Accredited Standards Committee*

INCITS, InterNational Committee for Information Technology Standards**

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**From 1997-2001, INCITS operated under the name Accredited Standards Committee NCITS, National Committee for Information Technology Standards.

Date: February 4, 2002

Ref. Doc: NPRM 01-290 (01-278 Proceedings)

Reply to: Joseph A. Naujokas, Chair INCITS B10: Cards and Personal Identification

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To: Ms. Magalie Roman Salas

Secretary

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

From: Joseph A. Naujokas, Chairman, INCITS B10, Cards and Personal Identification

Subject: Regarding: NPRM 01-290 (01-278 Proceedings)

Dear Ms. Salas:

As the petitioner of the original RM-9375, which the proposal was included in the above referenced NPRM, this technical committee continues to support the proposed changes in section 15.225 of FCC Rules, 47 C.F.R. § 15.225 to allow RFID interrogators operating at 13.56 MHz to transmit data more effectively over longer localized ranges. Also, it would harmonize the regulations and equipment performance with Europe and Canada.

This committee is accredited by American National Standards Institute (ANSI) to develop national standards for identification cards and related devices. NCITS B10 committee has 52 company and association members representing many industries such as financial, manufacturing, service, retail and technology. The B10 Committee voted in support of this request on January 24, 2002.

This regulation change does allow higher security, data transfer and read range performance in access control, airline baggage handling, parcels tracking and financial transaction sectors.

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Item identification without requiring "line of sight" is a signification benefit in customs clearance and parcels movement. There appears to be greater emphasis on knowing the person (identification cards) and package's contents since September 11.

We urge the Commission to move forward in adopting a new rule amendment regarding paragraph 21 (section 15.225) at 13.56 MHz frequency.

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to read "Joseph A. Naujokas". The signature is written in a cursive style with a large, sweeping initial "J".

Joseph A. Naujokas
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